

Introduction

Theis Precision Steel is a domestic cold rolled manufacturer for high quality and specialty strip steel applications. We employ 250+ employees to convert raw material bought as hot-rolled strip steel coils to precision cold-rolled strip product for many different end use manufacturing industries.

(a) Product Designations (ASTM and HTS Numbers)

Theis purchases hot rolled strip coils in the annealed, pickled and oiled condition from steel suppliers. The table below shows ten product designations that Theis is seeking exclusion to purchase.

Item	Theis Grade	Product Designations	HTS Number
1	RM 37	AISI 1086 Modified (DIN 80W1 / 1525)	7211 19 6000
2**	RM 54	AISI 1095 Modified (DIN C100W / 1654)	7211 19 6000
3	RM 55	AISI 1095 Modified (100MnCrW4)	7211 19 6000
4	RM 61	AISI 6135 Modified	7226 91 7000
5	RM 72	AISI 6150 Modified	7226 91 7000
6	RM 73	AISI 9262 Modified (DIN 67SiCr5 /7103)	7226 91 8000
7	RM 78	DIN 2390 Modified (3% Cr)	7226 91 2560
8	RM 80	DIN 2390 Modified (3% Cr – 2% Mo)	7226 91 2560
9	RM 81	ASTM D6A	7226 91 1560
10	RM 86	ASTM D6A Modified	7226 91 1560

**Note: We are only requesting exclusion in item 2 – RM54 – AISI 1095 modified for 250,000 lbs per month. The balance of our needs can be satisfied by the US mills because the banding problem is not much a prevalent issue.

XXX	(X)	ΚX	(X)	(XX	XX	XX	ХX	XX	(XX	(X)	(X)	(X	XX.	ХX	хх	(X)	(X	ХX	ХX	ХХ	(X)	XX.	ХX	ХX	XX	(X)	(X	XX	XX.	ХX	ХX	ХX	XX	ХX	XX	ХX	ХX	XXX	(X)	(XX	ίX
XXX	(X)	(X)	(X)	(XX	XX	XX	XX	XX	(XX	(X)	(X)	(X	XX.	ХX	XX	X	(X	ХX	ХX	XX	(X)	XX.	ХX	ХX	XX	(X)	(X	XX	XX.	XX	XX	XX	XX.	XX	XX.	ХX	ХX	XXX	(X)	(XX	ίX
XXX	(X)	ΚX	(X)	(XX	XX	XX	XX	XX	(XX	(X)	(X)	(X	XX	ХX	XX	(X)	(X	ХX	XX	XX	(X)	XX.	ХX	XX	XX	(X)	(X	XX	XX.	XX	XX	XX	XX	XX	XX	ХX	XX	XXX	(X)	(XX	ίX
XXX	(X)	(X)	(X)	(XX	XX	XX	хх	XX	(XX	(X)	(X)	(X	XX.	ХX	хх	(X)	(X	хх	ХX	XX	(X)	XX.	хх	ХX	XX	(X)	(X)	XX	XX:	XX	ХX	.]									

(b) Product Description Based on Physical Characteristics

(c) Basis for Requesting Exclusion

(d) Names and Location of Producers

- (e) & (f) We would have no way of determining the total US consumption, nor do we know the total US production of each product.

Executive Summary

The products requested for exclusion by <code>[xxxxx]</code> have critical performance requirements, which is best achieved with raw material that is absent of carbide banding in the microstructure. This condition is a result of the solidification process employed by domestic producers and tests to change this condition have not been successful. Based on the product requirements and the inability to purchase non-banded product domestically, the USTR and ITC should grant the request to exclude the products noted for import relief under section 201 or 203.

Sincerely,

Richmond W. Glover President & Chief Operating Officer

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Fig. 1
These photomicrographs apply to C1086 C1095 100 MN CR W4 Theis grades RM37, RM54, RM55

These photomicrographs apply to
AISI 6135
Theis grade RM61

These photomicrographs apply to AISI 6150M & 9262 Theis grades RM72, RM73

These photomicrographs apply to D6A, D6A 3% Chrome, D6A 3% Chrome – 2% Moly, D6A Modified Theis grades RM78, RM80, RM81, RM86

These photomicrographs apply to C1086 C1095 100 MN CR W4 Theis grades RM37, RM54, RM55

Fig. 6
These photomicrographs apply to
AISI 6135
Theis grade RM61

These photomicrographs apply to AISI 6150M & 9262
Theis grades RM72, RM73

These photomicrographs apply to D6A, D6A 3% Chrome, D6A 3% Chrome – 2% Moly, D6A Modified Theis grades RM78, RM80, RM81, RM86